

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

ALBERT L. GRAY, Administrator, et al :
 :
vs. : C.A. No. 04-312-L
 :
JEFFREY DERDERIAN, et al :

ESTATE OF JUDE B. HENAULT, et al :
 :
vs. : C.A. No. 03-483-L
 :
AMERICAN FOAM CORPORATION, et al :

MOTION OF THE DEFENDANTS, JEFFREY DERDERIAN,
MICHAEL DERDERIAN, AND DERCO, LLC, TO APPROVE THE SETTLEMENT

Defendants, Jeffrey Derderian, Michael Derderian, and DERCO, LLC, move that the Court approve the settlement of the Plaintiffs' claims against said Defendants for payment in the amount of \$813,218.82, plus or minus, from the Defendants' bankruptcy estates, less such sums as are allowed as administrative costs of the Bankruptcy Estates of the Defendants, as a "good faith settlement," pursuant to Rhode Island Gen. Law §§ 10-6-7; 10-6-8 (the Rhode Island Uniform Contribution Among Tortfeasors Act).

In support of their motion, the Defendants rely on the attached memorandum of law.

JEFFREY DERDERIAN, MICHAEL
DERDERIAN, and DERCO, LLC
By their attorneys,

/s/Anthony F. DeMarco
Anthony F. DeMarco, Esquire #0799
REYNOLDS, DeMARCO & BOLAND, LTD.
146 Westminster Street, Suite 400
Providence, RI 02903
(401) 861-5522
Fax: (401) 331-4861
tdemarco@conversent.net

and

/s/Joseph J. Bellew

Joseph J. Bellew, Esquire #51025

COZEN O'CONNOR

1201 North Market Street, Suite 1400

Wilmington, DE 19801

(302) 295-2025

jbellew@cozen.com

CERTIFICATION

I hereby certify that on the 4th day of June, 2009, I caused to be served a copy of the Defendants' Motion to Approve Settlement via electronic mail to all parties who are registered participants identified on the Notice of Electronic Filing or by other means to the counsel listed on the attached service list.

/s/Anthony F. DeMarco

SERVICE LIST THROUGH CM/ECF:

Karen A. Alegria
karen@briancunha.com

Thomas C. Angelone
angelonelaw@aol.com, Conlonmaryv@aol.com, stationfire@esquirecom.com

James K. Archibald
jima@wmtburnett.com

Steven T. Armato
sarmato@cetcap.com, agriffin@cetcap.com, mcahalane@cetcap.com, kbjornlund@cetcap.com

Joseph Aronson
jaronson@mccormackfirm.com

Charles L. Babcock
cbabcock@jw.com

John P. Barylick
jpb@wistbar.com

Andrew A. Beerworth
abeerworth@morrisonmahoney.com

Joseph J. Bellew
jbellew@cozen.com

C. Russell Bengtson
rbengtson@ckmlaw.com

James A. Bigos
jim@b-plaw.com

Kyle E. Bjornlund
kbjornlund@cetcap.com

Russell Bramley
Rbramley@hbhlaw.net,kpicozzi@hbhlaw.net

Stephen E. Breggia
sbreggia@bbglaw.us

Thomas G. Briody
TBriodylaw@aol.com

William F. Burke
wburke@apslaw.com

Mark D. Cahill
mcahill@choate.com

John A. Caletri
jcaletri@melicklaw.com

Lawrence Joseph Cappuccio
l.cappuccio@cox.net

Scott M. Carroll
scarroll@bmcattorneys.com

Joseph V. Cavanagh, Jr
jvc@blishcavlaw.com

Lawrence G. Cetrulo
lcetrulo@cetcap.com,agriffin@cetcap.com,mcahalane@cetcap.com,kbjornlund@cetcap.com

Kim M. Clarke
kclarke@nixonpeabody.com,ProEfile@nixonpeabody.com,bos.managing.clerk@nixonpeabody.com

Adam J. Combies
acombies@piercedavis.com

Karen K. Corcoran
karen@desistolaw.com

Edward M. Crane
ecrane@skadden.com

Ronald J. Creamer
resminilaw@yahoo.com

Jennifer A Creedon
jcreedon@cetcap.com

John R. Crockett
jcrockett@fbtlaw.com

Brian R. Cunha
brian@briancunha.com

James S. D'Ambra
ricedolan@ricedolan.com

Kathleen M. Daniels
kathleen@desistolaw.com

Michael R. DeLuca
mrd@gsm-law.com

Gerald C. DeMaria
gdemaria@hcc-law.com

Marc DeSisto
marc@desistolaw.com,laura@desistolaw.com

Michael A. DeSisto
michael@desistolaw.com,laura@desistolaw.com

Eric B. DiMario
edimario@gunninglafazia.com

Mark P. Dolan
ricedolan@ricedolan.com

John J. Doody
doody@lbbslaw.com

Christopher C. Fallon , Jr
cfallon@cozen.com

John J. Flanagan
jflanagan@torti.com

V. Edward Formisano
edf@sfclaw.com,sfc1@sfclaw.com

Bennett R. Gallo
brg@ndgrb.com

Richard T. Gallone
richard@briancunha.com

Josh M. Greenbaum
jgreenbaum@cozen.com

Mark C. Hadden
mhadden@mhaddenlaw.com

Nancy W. Hamilton
nhamilton@jw.com

Timothy B. Hardwicke
timothy.hardwicke@lw.com,che filing@lw.com,suzanne.kadus@lw.com

William M. Heffernan
HeffernanLaw@aol.com

Carl A. Henlein
chenlein@fbtlaw.com

Eric Bradford Hermanson
ebh@choate.com

John G. Hines
office@hinesandcorrigan.com

Daniel J. Horgan
horganlaw@snet.net

Stephen A. Izzi
sizzi@mosesafonso.com

Patrick T. Jones
pjones@cmjlaw.com

Howard Julian
sohohomes@yahoo.com

Fred A. Kelly , Jr
fkelly@nixonpeabody.com,ProEfile@nixonpeabody.com,bos.managing.clerk@nixonpeabody.com

David D. Langfitt
dlangfitt@mmwr.com

Ronald P. Langlois
rlanglois@smithbrink.com

James R. Lee
jlee@riag.ri.gov

S. Michael Levin
mlevin@wszlaw.com,efile@wszlaw.com,slevesque@wszlaw.com

Thomas W. Lyons , III
tlyons@straussfactor.com

Richard W. MacAdams
rmacadams@mwdglaw.com,vburrus@mwdglaw.com

Stephen J. MacGillivray
smacgillivray@eapdlaw.com,aizzo@eapdlaw.com

David E. Maglio
dmaglio@magliolaw.com,tmchugh@magliolaw.com,dgianq@magliolaw.com

John R. Mahoney
jackmahoney@amlawllp.com,johnmahoney@amlawllp.com

Eva Marie Mancuso
emancuso@hwac.com

Mark S. Mandell
msmandell@msn.com,hbonnett@msb-atty.com,msb@msb-atty.com

Donald J. Maroney
dmaroney@kkrs.com

James C. Martin
jcmartin@reedsmith.com

Michael J. Mazurczak
mmazurczak@melicklaw.com

Michael McCormack
mmccormack@mccormackfirm.com

W. Thomas McGough, Jr
wmcgough@reedsmith.com

Francis E. McGovern
mcgovern@law.duke.edu

Daniel P. McKiernan
dmckiernan@mckiernanhessler.com

Edwin F. McPherson
emcpherson@m-klaw.com

Howard A. Merten
hm@psh.com,slb@psh.com

Steven A. Minicucci
sminicucci@calvinolaw.com

David Mitrou
dmitrou@mccormackfirm.com

Ralph J. Monaco
rmonaco.c-l@snet.net

Tracy L. Montalbano
reardonlaw@aol.com

James T. Murphy
jtm@hansoncurran.com

John F. Murphy
stationfire@shb.com

Robert T. Norton
rnorton@sloanewalsh.com

Mark T. Nugent
mnugent@morrisonmahoney.com,cmontgomery@morrisonmahoney.com

William E. O'Gara
wogara@pldwlaw.com,ksilva@pldwlaw.com

Mark Parsky
mep@mcveyparsky-law.com

Rebecca Tedford Partington
rpartington@riag.ri.gov,mdifonzo@riag.ri.gov

William P. Pistorius
wpistorius@clausen.com

Karey P. Pond
kpond@tedfordhenry.com

William A. Poore
wpoore@poorerosenbaum.com

Kevin R. Powers
kpowers@cetcap.com

Stephen M. Prignano
sprignano@eapdlaw.com,rjil@eapdlaw.com,edolan@eapdlaw.com

Robert I. Reardon , Jr
reardonlaw@aol.com

Charles N. Redihan , Jr
credihan@kprlaw.com,sharrison@kprlaw.com

Robert L. Reifenberg
rreifenberg@clausen.com

James H. Reilly, III
jreilly@kkrs.com

Ronald J. Resmini
resminilaw@yahoo.com

James J. Restivo
jrestivo@reedsmith.com

Steven M. Richard
srichard@nixonpeabody.com,ProEfile@nixonpeabody.com,bos.managing.clerk@nixonpeabody.com

Dennis J. Roberts, II
droberts@djrlaw.com

Kristin E. Rodgers
ker@blishcavlaw.com

James A. Ruggieri
jruggieri@hcc-law.com,sodonoghue@hcc-law.com,spitcavage@hcc-law.com

Denean M. Russo
drusso@wdglaw.com,mdaugherty@mwdglaw.com

Michael G. Sarli
mgs@gsm-law.com

Timothy R. Scannell
tscannell@bmcattorneys.com

Peter J. Schneider
pschneider@cmjlaw.com

Ann M. Songer
stationfire@shb.com

Michael A. St. Pierre
mikesp@rrsplaw.com,susanl@rrsplaw.com

Rajaram Suryanarayan
rsury@gunninglafazia.com

Henry M. Swan
hms@dksblaw.com

Kelly Michels Sweeney
knm@hansoncurran.com

Robert K. Taylor
rkt@psh.com,tlc@psh.com

Frederick B. Tedford
ftedford@tedfordhenry.com,shinckley@tedfordhenry.com,kpond@tedfordhenry.com

Mark R. Ter Molen
mtermolen@mayerbrown.com

Andrew J. Trevelise
atrevelise@reedsmith.com

Bruce Gregory Tucker
btucker@legalmgt.com

T. Dos Urbanski
durbanski@melicklaw.com

Earl H. Walker
ewalker@jw.com

Susan S. Wettle
swettle@fbtlaw.com,tthomas@fbtlaw.com,jcleary@fbtlaw.com

Max Wistow
mwistow@wistbar.com,jdean@wistbar.com

George Wolf
stationfire@shb.com

David A. Wollin
dwollin@apslaw.com,epickett@apslaw.com,btallman@apslaw.com

Manual Notice List

Curtis R. Diedrich
cdiedrich@sloanwalsh.com

Nicholas B. Kosiavelon
Boyle, Morrissey & Campo, P.C.
695 Atlantic Avenue
Boston, MA 02111

Tyler Jay Lory
Clausen Miller PC
1 Chase Manhattan Plaza
39th Floor
New York, NY 10005

Meghan H. Sullivan
531 Salem Heights Drive
Gibsonia, PA 15044